

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT CHATTANOOGA**

MAXWELL JARNAGIN,)	
)	
Plaintiff,)	No. 1:20-cv-00044-TRM-CHS
)	
v.)	
)	
DANIEL WILKEY, et al.,)	
)	
Defendants.)	

**MOTION FOR ORDER REQUIRING THE DEFENDANT, HAMILTON
COUNTY, TENNESSEE TO PRESERVE ELECTRONIC EVIDENCE AND FOR
AN ORDER ALLOWING THE PLAINTIFFS TO CONDUCT A FORENSIC
EXAMINATION OF ALL COMPUTERS AND DATA PRESERVING DEVICES
INVOLVED IN ANY WAY WITH THE PRESERVATION OF VIDEO CREATED
BY HAMILTON COUNTY OFFICERS**

Comes now the plaintiff, by and through counsel, and pursuant to Federal Rule of Civil Procedure 37, moves this Court for an Order requiring the defendant, Hamilton County, Tennessee, to preserve all electronic data involving video of Hamilton County Sheriff's Department personnel taken and otherwise preserved by defendant Hamilton County, Tennessee. In support of this Motion, see Memorandum filed simultaneously herewith.

Respectfully Submitted,

CAVETT, ABBOTT & WEISS, PLLC

By: /s/ John C. Cavett, Jr.

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CERTIFICATE OF SERVICE

I hereby certify that on the 28th day of February 2020, a true and exact copy of the foregoing pleading has been served electronically via the Court's electronic case filing system to all parties specified in the Notice of Electronic Filing issued by the electronic case filing system.

/s/ John C. Cavett, Jr.
John C. Cavett, Jr.

¹ Attorney Rip Biggs has applied for admission pro hoc vice.